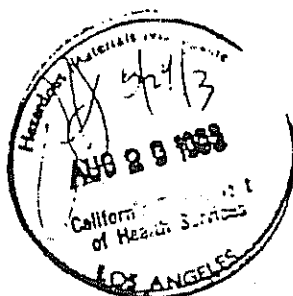


Colt Industries



Tront Tube Division
Crucible Inc
P. O. Box 3068
2100 East Orangethorpe
Fullerton, California 92634
714/526-5622

CAD 008325110

August 26, 1983

California State Dept. of Health Services
Hazardous Waste Management Branch
107 South Broadway, Room 7128
Los Angeles, California

Gentlemen:

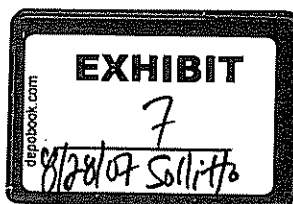
Enclosed is our operation plan for hazardous waste,
treatment and storage at the Fullerton operation.

This letter will also serve as notice that this plant
will close on or before December 31, 1983. A closure plan
is incorporated as part of the operation.

Sincerely,

Harry L. Murphy
Manager of Quality Assurance

cc: C. Abend
D. Gehr
F. Hunter



TRENT TUBE DIVISION - ~~W~~OLT INDUSTRIES
FULLERTON, CALIFORNIA

CLOSURE PLAN AND COST ESTIMATES
FOR HAZARDOUS WASTE FACILITIES

FACILITY: Trent Tube Division, Fullerton Operation
2160 East Orangethorpe Avenue
Orange County
Fullerton, California 92634

OPERATOR: Trent Tube Division
Crucible Materials Corporation
P.O. Box 3068
Fullerton, California 92634

FACILITY ID NO.: CAD 008325110

FACILITY PHONE NO.: (714) 526-5522

I. GENERAL

- A. This plan is prepared in compliance with the California Department of Health Services, Interim Status Document for the Fullerton facility, Section V, dated April 6, 1981.
- B. This plan is to be submitted for approval to the California Regional Water Quality Board (CRWQB) prior to closure.

The local board is located at:

6809 Indiana Street
Suite 200
Riverside, California

Attention: Mr. James Anderson
Executive Officer
714/684-9330

II. WASTE INVENTORY

A. Pickle Liquor - EPA Number K062

- (1) Contained in two process tanks of 2000 gallons each.
Maximum volume at closure, 4000 gallons total.
- (2) Waste is neutralized prior to disposal.

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

B. 1,1,1 Trichloroethane Waste - EPA Number F001

- (1) Waste is contained in 55 gallon drums. Maximum storage capacity is 15 drums.
- (2) Solvent used during manufacturing is contained in a degreaser unit having a maximum capacity of 2400 gallons.

C. Waste Mineral Spirits & Kerosene

- (1) Contained in 55 gallon drums.
- (2) Storage capacity at closure is 8 drums.

D. Waste Oil - EPA Number NA

- (1) Contained in 10/20 gallon reservoirs at each of six draw benches.
- (2) Maximum storage capacity is 200 gallons bulk waste plus the reservoir at each draw bench.

E. Dilute Detergent Cleaning Wastes - EPA Number NA

- (1) Contained in a steel storage tank 200 gallons maximum capacity.

III. FACILITY DECONTAMINATION STEPS

A. Pickle Liquor Facilities

- (1) Neutralize pickling acids with ammonia as per operating plan.
- (2) Pump neutralized solutions to bulk tank truck.
- (3) Manifest solutions for treatment and disposal.
- (4) Dismantle and cut up nitric-HF pickle tank and exhaust intakes inside building.
- (5) Manifest contaminated equipment for disposal.
- (6) Arrange with supplier to remove ammonia storage tanks and vent ammonia feed system.

B. 1,1,1 Trichloroethane Facilities

- (1) Arrange with reclaimer to pump out degreasing tank, recovery still equipment and 55 gallon drums of still bottoms.
- (2) Arrange with reclaimer to haul off remaining quantities of virgin solvent in outside storage tanks.

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

- (3) Rinse degreasing tank and recovery still system with detergent and water pump detergent solution to bulk tank truck for disposal.
- (4) Manifest solvent and cleaning solution for disposal.
- (5) Arrange with vendor for removal of vertical storage tank.
- (6) Clean and ventilate remaining horizontal storage tank.

C. Mineral Spirit and Kerosene Facilities

- (1) Arrange with reclaimer to pump out 55 gallon drums.
- (2) Clean impound areas with detergent solution.
- (3) Transfer cleaning solution to the 200 gallon storage tank.
- (4) Manifest mineral spirits and kerosene for disposal by recycling.

D. Waste Oil Facilities

- (1) Transfer oil from draw bench reservoirs to 200 gallon storage tank.
- (2) Rinse draw bench reservoirs and pump system with detergent solution.
- (3) Transfer detergent solution to storage tank.
- (4) Arrange for disposal of waste oil from 200 gallon storage tank.
- (5) Rinse out 200 gallon storage tank with detergent.
- (6) Rinse out oily waste impound area with detergent.

E. Detergent Cleaner Solution Disposal

- (1) Pump out 200 gallon storage tanks (2) and impound area into tank truck.
- (2) Manifest cleaning solutions for proper disposal.

F. Empty Drum Disposal

- (1) Arrange for drum reprocessor to pick up reusable drums.
- (2) Crush unusable drums and manifest for disposal.

IV. CLOSURE SCHEDULE

- A. After suspension of manufacturing operations, additional wastes due to clean-up operations, etc. will be generated for a maximum of thirty (30) days.
- B. Upon suspension of manufacturing operations, all wastes will be treated within forty (40) days and removed from the premises within sixty (60) days.

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

V. COST ESTIMATES FOR FACILITY CLOSURE

A. Pickle Liquor and Facilities

(1) Labor costs for neutralization of acids and cleaning and removal of tank and exhaust system. 60 hours @ \$18/hr.	\$1060
(2) Transportation, treatment, and disposal of 4000 gallons of neutralized pickle liquor. (4000 gal.) X (8.34 #/gal.) X (125/ton) ÷ (2000 #/gal.)	2085
(3) Transportation and disposal of pickle tank and exhaust system.	<u>1200</u>
Subtotal	\$4365

B. 1,1,1 Trichloroethane Facilities

(1) Labor costs for cleaning tanks. 24 hours @ \$18/gal.	432
(2) Credit for recovered solvent. 2000 gal. @ \$.60/gal.	(1200)
(3) Disposal of detergent rinse solution.	<u>400</u>
Subtotal - Credit	(\$368)

C. Mineral Spirits and Kerosene Facilities

(1) Credit for solvent recoveries.	(\$125)
Subtotal - Credit	(\$125)

D. Waste Oil Facilities

(1) Labor to transfer oil from draw benches to waste oil tank, clean oil reservoirs, storage tank and impound area. 24 hours @ \$18/hr.	\$432
(2) Transportation and disposal of waste oil.	<u>400</u>
Subtotal	\$832

E. Detergent Cleaning Solution Disposal

(1) Transportation and disposal.	<u>\$400</u>
Subtotal	\$400

TRENT TUBE DIVISION - COLT INDUSTRIES
FULLERTON, CALIFORNIA

F. Empty Drum Disposal

(1) Cleaning of reusable drums by drum processor. \$10 each X 20 drums	\$200
(2) Crushing and disposal of non-reusable drums. \$15 X 15 drums	<u>225</u>
Subtotal	\$425

G. Administration Consultant Services & Contingencies

(1) Administration and supervision	\$3000
(2) Professional engineer recommendations, inspection and certification.	5000
(3) Contingencies	<u>2000</u>
Subtotal	\$10,000

H. Total Estimated Closure Cost - 4/2/84	\$15,529
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April 4, 1984
Date

Harry L. Murphy
Harry L. Murphy
Plant Manager